



LAW OFFICES OF LAURIE E. MORRISON

October 11, 2022

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**VIA ECF**

Hon. Jennifer L. Rochon, U.S.D.J.  
United States District Court, SDNY  
500 Pearl Street, Courtroom: 20B  
Chambers Room 1920  
New York, NY 10007  
Aisha Bams, Courtroom Deputy: 212-805-0204

**RE: Edward Banks v. McGlynn, Hays & Co., Inc. et al.**  
**Consolidated Cases Civ. Action Nos.: 19-cv-05727, 21-cv-00679 (JLR) (RWL)**

Dear Hon. Rochon:

In accordance with Your Honor's October 7<sup>th</sup> Directive (Dkt. 106, 372), with Rule 1(A) of Your Honor's Individual Rules, and with the SDNY's Standing Order, 19-MC-00583, and Section 6 of the ECF Rules & Instructions (which were incorporated by reference therein), Plaintiff's counsel respectfully submits this motion to file the unredacted version of this letter and supporting medical record *ex parte* under seal, as the documents contain counsel's highly sensitive and confidential medical/health information that would be intended for the Court's Eyes Only. The documents request remote appearances by Plaintiff's counsel for medical/health reasons.

Lugosch v. Pyramid Co. of Onondaga County, 435 F.3d 110 (2d Cir. 2006) would also arguably not apply, as counsel's information is plainly irrelevant to the underlying claims and/or defenses asserted in the instant case and it would not otherwise be considered judicial documents/records, so the common law presumption of public access would not attach.

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

Plaintiff's counsel thanks the Court for its time and consideration.

Respectfully Submitted,



Laurie E. Morrison, Esq.

Request **GRANTED**. Plaintiff's letter (ECF No. 108 in docket 21-cv-00679 and ECF No. 374 in docket 21-cv-00679) and the redacted portions of Plaintiff's letter-motion (ECF No. 373 in docket 19-cv-05727 and ECF No. 107 in docket 21-cv-00679) shall hereby remain sealed and under ex-parte view only.

Dated: October 12, 2022  
New York, New York

SO ORDERED



JENNIFER L. ROCHON  
United States District Judge